

Sirs:

While I live within the boundaries of a city, my location is still relatively rural, and underserved by local television transmitters. I am a licensed amateur radio operator, first licensed in 1972. I am also a user of 802.11b networks, and other unlicensed data transmitters.

I do not support the opening of TV broadcast frequencies for use by unlicensed transmitters. I find the argument that GPS can be used to determine "unused" frequencies to be unconvincing, given that my location would almost certainly be defined to be in an area where all of the channels I can pick up are "unused". Further, "sniffing" for unused frequencies would require every device to have an antenna system as efficient as any local user would have. In other words, if my neighbor uses his 30 foot tower and directional antenna to pick up a channel from Portland, then my unlicensed device is unlikely to think that the channel is in use unless it, too, has a 30 foot tower and directional antenna. My device would easily swamp the signal from Portland. My neighbor would be unlikely to have a device capable of receiving my signal, and I am unlikely to be transmitting enough information, to make locating my interference possible.

I will point to the free-for-all that is currently taking place in the 2.4GHz unlicensed band as a likely precedent for what would appear in our TV bands were they to become license-free. I have two video links operating in the band, and they can almost operate without interfering with each other. When I turn on my 802.11b network, the video suffers. (I don't currently have any BlueTooth systems, but my understanding is that they stop working if there are other local 2.4GHz users.) And then, if I use my microwave oven, all of my wireless systems stop working. This is true even when my neighbor uses his microwave oven. How am I supposed to determine the source of the interference when it lasts for only a few minutes, and takes place in a band where I am unable to use direction finding equipment? What do you imagine he would say were I to knock on his door and ask him to stop using his interfering device?

Imagine this quagmire on a national level when the interference is with broadcast television, as a primary user, where the interfering devices are required - by law - to stop. Who do I call to force my neighbor to stop using his wireless network when I want to watch Monday Night Football? Is the FCC going to come out to deal with this? Are the local cops going to understand what the problem is?

I will also note that the impending (yet unlikely) conversion from analog to HDTV will not solve this problem. Unless the limited number of stations in the state of Oregon replace all of their translators with HDTV systems, the only reception of off-air television will require 30 foot towers and directional antennas, and unlicensed transmitters will decimate the coverage that is available.

Thank you for your consideration. Please don't break a working system.

John Stanley